

EXHIBIT 7

VIDEOTAPED DEPOSITION OF HERBERT RICHARD LAWSON, JUNIOR
CONDUCTED ON FRIDAY, MAY 28, 2010

1 (Pages 1 to 4)

<p style="text-align: right;">1</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4 -----x</p> <p>5 ePLUS, iNC.,)</p> <p>6 Plaintiff,)</p> <p>7 v.) Civil Action No.</p> <p>8 LAWSON SOFTWARE, INC.,) 3:09-cv-620(REP)</p> <p>9 Defendant.)</p> <p>10 -----x</p> <p>11</p> <p>12 VIDEOTAPED DEPOSITION OF LAWSON SOFTWARE, INC.</p> <p>13 By and Through Its Corporate Designee</p> <p>14 HERBERT RICHARD LAWSON, JUNIOR</p> <p>15 Washington, DC</p> <p>16 Friday, May 28, 2010</p> <p>17 12:32 p.m.</p> <p>18</p> <p>19</p> <p>20 Job No.: 1-180035</p> <p>21 Pages 1 - 84</p> <p>22 Reported By: Joan V. Cain</p>	<p style="text-align: right;">3</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 ON BEHALF OF PLAINTIFF:</p> <p>4 JENNIFER A. ALBERT, ESQUIRE</p> <p>5 GOODWIN PROCTER, LLP</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, DC 20001</p> <p>8 Telephone: (202) 346-4000</p> <p>9 AND</p> <p>10 MICHAEL G. STRAPP, ESQUIRE</p> <p>11 JAMES D. CLEMENTS, ESQUIRE</p> <p>12 GOODWIN PROCTER, LLP</p> <p>13 Exchange Place</p> <p>14 Boston, Massachusetts 02109</p> <p>15 Telephone: (617) 570-1000</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">2</p> <p>1 Videotaped Deposition of LAWSON SOFTWARE,</p> <p>2 INC., By and Through Its Corporate Designee, HERBERT</p> <p>3 RICHARD LAWSON, JUNIOR, held at the law offices of:</p> <p>4</p> <p>5 GOODWIN PROCTER, LLP</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, DC 20001</p> <p>8 (202) 346-4000</p> <p>9</p> <p>10 Pursuant to Notice, before Joan V. Cain,</p> <p>11 Certified Court Reporter and Notary Public in and</p> <p>12 for the District of Columbia.</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">4</p> <p>1 A P P E A R A N C E S C O N T I N U E D</p> <p>2</p> <p>3 ON BEHALF OF DEFENDANT:</p> <p>4 WILLIAM D. SCHULTZ, ESQUIRE</p> <p>5 MERCHANT & GOULD</p> <p>6 3200 IDS Center</p> <p>7 80 South Eighth Street</p> <p>8 Minneapolis, Minnesota 55402-2215</p> <p>9 Telephone: (612) 332-5300</p> <p>10</p> <p>11 ALSO PRESENT:</p> <p>12 Akim Graham, Videographer</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

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<p>17</p> <p>1 released in 1990?</p> <p>2 A No. I mean, I wouldn't know the names of</p> <p>3 the documents. They were user documents. They were</p> <p>4 database layout documents, several types of</p> <p>5 documents. I'd have to look at the dates.</p> <p>6 Q Do they include Lawson Software 5.0</p> <p>7 manuals?</p> <p>8 A I never saw the manuals themselves.</p> <p>9 That -- that we would have sent to clients? I</p> <p>10 didn't look at manuals themselves.</p> <p>11 Q Okay. So you mentioned that you saw user</p> <p>12 documents, database layout documents, and several</p> <p>13 other types of documents. Can you describe for me</p> <p>14 the types of user documents that you reviewed that</p> <p>15 refreshed your recollection that Lawson 5.0 was</p> <p>16 released in 1990?</p> <p>17 A There was a document based on database</p> <p>18 layouts that the -- the IT department, the technical</p> <p>19 people receive from those -- from those systems.</p> <p>20 Q Any other specific types of documents that</p> <p>21 you can recall reviewing regarding Lawson 5.0?</p> <p>22 A No.</p>	<p>19</p> <p>1 Q Do you know when in 1992 it was released?</p> <p>2 A There's several release dates associated</p> <p>3 with products. Some are GA, some are beta -- beta</p> <p>4 dates, and some are testing dates, but I would say</p> <p>5 around July.</p> <p>6 Q July 1992?</p> <p>7 A Mm-hmm.</p> <p>8 Q What is a GA date?</p> <p>9 A General availability.</p> <p>10 Q And what's a beta date?</p> <p>11 A When every product goes out, we have a few</p> <p>12 prospects or clients who are willing to be the --</p> <p>13 the beta client. In other words, they'll take it</p> <p>14 before everybody else does.</p> <p>15 Q The guinea pig client?</p> <p>16 A No. Depends who it goes to -- no.</p> <p>17 Everybody understands in our field, when they are a</p> <p>18 beta client -- in fact, people love -- people love</p> <p>19 to sign up to be a beta client because they get a</p> <p>20 lot of nice loving and care.</p> <p>21 Q So was July 1992 the general availability</p> <p>22 date for 6.0 or the beta release date for 6.0?</p>
<p>18</p> <p>1 Q And did you review those documents in</p> <p>2 connection with preparing for the deposition today?</p> <p>3 A For the dates, yes.</p> <p>4 Q Did you speak to anyone in connection with</p> <p>5 trying to determine the date that Lawson Software</p> <p>6 5.0 was released?</p> <p>7 A Yes.</p> <p>8 Q Was that Mr. Dooner?</p> <p>9 A It was Mr. Dooner and a few other people.</p> <p>10 I can't remember their names, who's -- who's --</p> <p>11 we're -- we're looking back at old documents and</p> <p>12 documentation to tell us when they were released.</p> <p>13 We knew they -- we knew approximately the time they</p> <p>14 were released. We were trying to come up with the</p> <p>15 right year.</p> <p>16 Q What about Lawson Software 4.0, when was</p> <p>17 Lawson Software 4.0 released?</p> <p>18 A Approximately eight -- 1987, 3 years</p> <p>19 earlier.</p> <p>20 Q And do you know when Lawson Software 6.0</p> <p>21 was released?</p> <p>22 A 1992, I believe.</p>	<p>20</p> <p>1 A I'm -- I'm not clear on that.</p> <p>2 Q Did you review any documents to refresh</p> <p>3 your recollection about the date of release of</p> <p>4 Lawson Software 6.0?</p> <p>5 A Yes. That was the date I -- those are the</p> <p>6 dates I just mentioned in 1992.</p> <p>7 Q And which documents did you review to</p> <p>8 refresh your memory about when it was released, 6.0?</p> <p>9 A I -- I can't tell you exactly which</p> <p>10 documents, but they were dated 1992. Those -- some</p> <p>11 of those I got over the phone from Todd and other</p> <p>12 people of the documents that they had. We have a</p> <p>13 lot of documents, a lot of different types of</p> <p>14 documents, and they have different dates on them,</p> <p>15 for -- for different reasons. Not the same document</p> <p>16 with different dates, but different documents with</p> <p>17 different dates.</p> <p>18 Q Do you recall any specific types of</p> <p>19 documents that concern 6.0 that helped you recall</p> <p>20 the specific dates it was released?</p> <p>21 A There was one that was a small little</p> <p>22 document that said -- well, the differences at a</p>

<p style="text-align: right;">69</p> <p>1 affected.</p> <p>2 Q Okay. And -- and this document, is it</p> <p>3 referring to -- is it the database schema for Lawson</p> <p>4 version 5.0?</p> <p>5 A Yes, it is.</p> <p>6 Q And what was the first date of release with</p> <p>7 respect to Lawson 5.0?</p> <p>8 A Probably around 1990 again. I'll give you</p> <p>9 that type of date.</p> <p>10 MR. STRAPP: Sorry. What did you say?</p> <p>11 THE WITNESS: Approximately 1990. I -- I</p> <p>12 can't give you a month. I can't give you a -- and,</p> <p>13 of course, it means it was in programming long</p> <p>14 before that. Those are -- those dates are either</p> <p>15 beta dates or release dates. Programming was being</p> <p>16 done before that.</p> <p>17 BY MR. SCHULTZ:</p> <p>18 Q So what you're saying is that the Lawson</p> <p>19 5.0 could have been actually released prior to 1990</p> <p>20 in BETA or other formats?</p> <p>21 A It could have been.</p> <p>22 MR. STRAPP: Objection, calls for</p>	<p style="text-align: right;">71</p> <p>1 marked for identification and was attached to the</p> <p>2 deposition transcript.)</p> <p>3 FURTHER EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>4 BY MR. STRAPP:</p> <p>5 Q First I'd like to ask you, Mr. Lawson,</p> <p>6 about Exhibit 4. That's the document that</p> <p>7 Mr. Schultz was asking you about, the large binder</p> <p>8 clipped document.</p> <p>9 A Oh, yes.</p> <p>10 Q Taking a look at that document now in front</p> <p>11 of you, can you describe for me how you know that</p> <p>12 that document is the database schema for Lawson</p> <p>13 release 5.0? What in the document indicates to you?</p> <p>14 A It was told to me it was, so the person who</p> <p>15 handled it to me, I believe.</p> <p>16 Q Okay. But you don't have any independent</p> <p>17 knowledge sitting here today that that document is a</p> <p>18 database schema for release 5.0, is that correct,</p> <p>19 independent from what you were told by others?</p> <p>20 A No, but I can assure you it is. I don't</p> <p>21 know what to say.</p> <p>22 Q Did you say no, but I can assure you it is</p>
<p style="text-align: right;">70</p> <p>1 speculation.</p> <p>2 THE WITNESS: I can -- I can still answer?</p> <p>3 BY MR. SCHULTZ:</p> <p>4 Q You may, but I'm going to actually rephrase</p> <p>5 the question so it's better for you.</p> <p>6 A Okay.</p> <p>7 Q Are you aware of any reasons why -- why a</p> <p>8 Lawson 5.0 system would be released prior to 1990?</p> <p>9 A Yes.</p> <p>10 Q Why?</p> <p>11 A We had beta clients, so it could have been</p> <p>12 released to a beta client.</p> <p>13 MR. SCHULTZ: Thank you, Mr. Lawson. I</p> <p>14 have nothing further.</p> <p>15 MR. STRAPP: Go off the record for a</p> <p>16 minute, please.</p> <p>17 THE VIDEOGRAPHER: Going off the record.</p> <p>18 The time is 2:04 p.m.</p> <p>19 (Recess.)</p> <p>20 THE VIDEOGRAPHER: Back on the record. The</p> <p>21 time is 2:07 p.m.</p> <p>22 (Lawson Deposition Exhibit 5 was</p>	<p style="text-align: right;">72</p> <p>1 or no, but I can show it is? I'm just trying -- I'm</p> <p>2 trying to get -- I'm trying to understand how it is</p> <p>3 here that you're testifying as Lawson's corporate</p> <p>4 representative about a particular document that you</p> <p>5 contend is Lawson 5.0. I don't have any reason not</p> <p>6 to accept you at your word. I just want to</p> <p>7 understand what the basis is for your belief that</p> <p>8 it's 5.0?</p> <p>9 A It was -- it was generated out of the</p> <p>10 information that was connected to our release 5.0 by</p> <p>11 a technical person who has -- who I have total</p> <p>12 confidence in, got it strict -- strictly from 5.0.</p> <p>13 Q And was that from a database that maintains</p> <p>14 5.0 information?</p> <p>15 A It maintained this, yes.</p> <p>16 Q And is that database located -- is that a</p> <p>17 database that's maintained by Lawson Software today?</p> <p>18 A I don't know if we've maintained this one</p> <p>19 today. Well, it's around, but we have newer</p> <p>20 releases. And this is an old release that's</p> <p>21 unsupported right now, so I don't know what the word</p> <p>22 "maintained" would be then.</p>